

E X H I B I T S

- 1 Email dated November 13, 2013 (Corrlinks) from M. Shelikhov.
 - 1A Email dated November 18, 2013
 - 1B Email dated November 19, 2013
- 2 Email dated November 19, 2013 (Corrlinks) form M. Shelikhov.
 - 2A Email dated November 20, 2013
 - 2B Email dated November 23, 2013
 - 2C Email dated November 25, 2013
- 3 Letter dated June 15, 2015 affirming that all data transmitted to movant is all inclusive of the total number of claims filed with MC and applicable to these proceedings.
- 4 Note dated November 29, 2013 from Attorney Rosen to movant stating that he requested and received the forwarded discovery from Attorney Shapiro (M. Shelikhov's Attorney).
 - 4A Note from Attorney Rosen upon transmittal of movant's client file, after movant filed a bar complaint against Rosen. Note dated February 20, 2015.
- 5 List of all service providers at the medical offices, including their specialized area of practice.
- 6 Pharmaceutical purchases (not all inclusive as movant does not have access to the totality of the records, which were seized and are in the possession of the government).
- 7 MC transmittal of filings for SZS; submittal as sample of records and submittal practice to substantiate the movant's claims.
- 8
 - (A) Administrative remedy response from the FCI Tallahassee Warden regarding the denial of visitation upon the request of the USAO of the Eastern District of New York.
 - (B) Footnote reference of the government's response to the pending resolution under §2241, the final phase of the administrative resolution process. Visitation remains denied at the USAO's request, althought the probation office of New York cleared and expressed no reservations.
- 9 Letter dated November 29, 2012 from Attorney Rosen to the Hon. Judge Gershon referencing an arrangement between himself and the "government attorney".

FROM: Martunyuk, Inna
TO: 81448053
SUBJECT: Hi
DATE: 11/13/2013 10:36:08 AM

Tell my mother that yesterday after her trial prosecutor's office sent a letter to the court, where I was given full protection for the return of my mother, so she should not think it was all in vain. She will not be separated from me for long, I am always close to her. I will see her soon, I am asking you to give her my warm kiss and my love, because letters take a long time.

I, Boris Timerman, of 63 Brighton 2nd Place, Apt.3-B, Brooklyn, NY 11235, hereby certify that I am competent in both the English and Russian languages and the attached is a true and faithful translation of the original text.



State of New York }
County of Kings }

I hereby certify that on this day, before me, personally appeared:

BORIS TIMERMAN

to me known to be the person described in and who translated the foregoing instrument and he acknowledged before me that he translated the same, and who has produced a Driver License as a type of identification.

Witness my hand and official seal in the County and State last aforesaid this
6th Day of May, 2016



Notary Public

Timerman Stanislav
Notary Public, State of New York
No. 04TI6266831
Qualified in Kings County
My Commission Expires August 6, 2016

Exhibit 1

TO: 81448053

Case 1:10-cr-00771-NG Document 846-2 Filed 12/12/16 Page 3 of 19 PageID #: 10745

SUBJECT....

DATE: 11/18/2013 09:36:08 AM

So I write to my Guardian Angel, My life, My Mommy!

My dearest mother!

So now everything is behind and now there is only to live and look forward. You did not write to me and I am sad and understand how you feel when I do not write to you. I can say that only you and forever are my life, and my only earning. I do not have any other desires, I just want to be next to you. I will be released in 15 days, and naturally I am only thinking when I will see you. Please add your sonny to the visitation list, and I will know on Monday more about the time. My darling I will do everything. I'll take everything to the victorious end, whatever it will be, I only want you to take care of your health and not be afraid that there is no one to rely on. I will be at home and everything will be OK. I am not interested in any personal life other then you and how are you doing, my dear mommy.

Always with you, always close.

Yours "March Bunny"

Love you, Love you.

I, Boris Timerman, of 63 Brighton 2nd Place, Apt.3-B, Brooklyn, NY 11235, hereby certify that I am competent in both the English and Russian languages and the attached is a true and faithful translation of the original text.



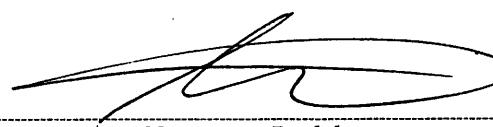
State of New York }
County of Kings }

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6th Day of May, 2016



Notary Public

Timerman Stanislav
Notary Public, State of New York
No. 01TI6266881
Qualified in Kings County
My Commission Expires August 6, 2016

Exhibit 1A

Case 1:10-cr-00771-NG Document 846-2 Filed 12/12/16 Page 4 of 19 PageID #: 10746
FROM: SHELILCHOV, MAKSIM
TO: 81448053
SUBJECT: MY LIFE!!!
DATE: 11/19/2013 09:21:14 PM

What ca I say - only sing you a song "You know, mother, how much does my life cost",
I do not have any other words yet...

Oh my God, how much I love you, my dearest mother.
I just want to say thank you for the fact that I have you.
Kissing, Kissing

I, Boris Timereman, of 63 Brighton 2nd Place, Apt.3-B, Brooklyn, NY 11235,
hereby certify that I am competent in both the English and Russian languages
and the attached is a true and faithful translation of the original text.

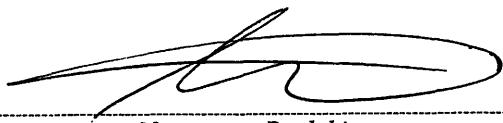


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County of Kings }

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No. 01T16266881
Qualified in Kings County
My Commission Expires August 6, 2016

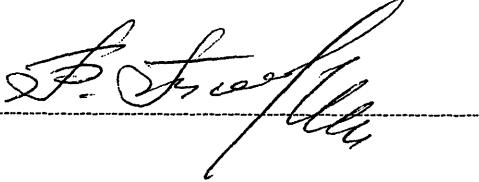
Exhibit 1B

Case 1:10-cr-00771-NG Document 846-2 Filed 12/12/16 Page 5 of 19 PageID #: 10747
FROM: SHELILCHOV, MAKSIM
TO: 81448053
SUBJECT: RE:MY LIFE!!!
DATE: 11/19/2013 09:21:14 PM

Mama, I am not only going to live!!! But till the last beat of my heart I will be proud of you and of what you have done for me. Your love and your feelings, because they cannot be compared with anything, and no one, never can substitute you and these feelings.

You are my number one person in life, till the end, and I am only asking for forgiveness, sincerely, because I left you alone for some time, but never again. I have no doubts that I will achieve everything I have to, but we will be doing it together, just have some patience. Just know. that you are being patient and that soon you will be together with your son, and I will explain the rest when I see you.

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Qualified in Kings County
My Commission Expires August 6, 2016

Exhibit 2

FROM: SHELILCHOV, MAKSIM

TO: 81448O53

SUBJECT: HELLO MY DEAR!!!

DATE: 11/20/2013 08:21:13 PM

Hello my dearest!

Maybe a stone fell off your heart, but my stone will not be released until I get you out.

How they were scaring you and chasing you into a corner I understood when they were scaring me the same way, and I cannot even tell you how painful and frightening it was.

They threw you under the train and decided to fill all the holes, remaining after all the "smart people" with you, as you were at the end of the line.

They will never destroy you, my dear mother, know that, and you will not be spending these nine and a half years in prison, I swear to you with my life.

No one will understand you and support you in any situation, because all your advisers like to receive it themselves, so they can all go to hell.

Yes, your son will be free and I know that my path is not easy, but life was never easy, as I understand it now, except for the last 6-7 years: I need a couple of months to recuperate and start doing something, as there is no time to rest, I rested for three years.

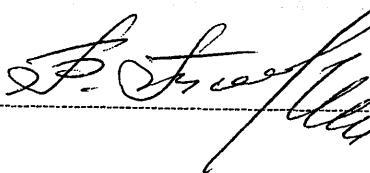
I understand you, regarding not giving up and regarding my further actions, but we will discuss it when I see you. The most terrifying is behind, and only now you know that you haven't done anything in vain, as you gave life to your son, and as a mother saved her; and that we do not agree with the punishment, this is our opinion, let God be everyone's judge, but I know that I will see you soon and this is most important.

Everything will be well, my mother, everyone remembers you and you will smile, and dance, and of course care for the little ones, but now just know why you live in this world, and know that you are loved, and we wait for you, and will never reject or betray you.

I love you.

Till I see you.

I, Boris Timerlman, of 63 Brighton 2nd Place, Apt.3-B, Brooklyn, NY 11235, hereby certify that I am competent in both the English and Russian languages and the attached is a true and faithful translation of the original text.



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Qualified in Kings County
My Commission Expires August 6, 2016

Exhibit 2A

FROM: SHELILCHOV, MAKSIM
TO: 81448053
SUBJECT: RE: MY DEAR SUN,
DATE: 11/23/2013 07:06:03 AM

Hello My Life...

To tell you honesty, I have only one thought, it is you, and that I will succeed and help you get out sooner, I have no doubts, but at the present moment it's really hard to live through this.

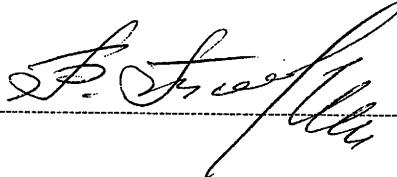
I am in a suspended state as these days last 48 hours as I expecting to get out. My day of release is about January 12, but now they are doing paperwork for the program(half-way house), so I will be released from here and will have to be suspended there for a short while, but it will be like in a hotel, I'll have my property and everything and I'll be working, only will have to sleep there. Regishka is doing everything without preparation with the lawyers and official work, so it will take a long time.

I am waiting impatiently not even for my freedom, but to hug you my dearest mother and console your heart. I already understood that no one is going to do anything, and it's easier for me to move about life as I count only on myself, and I also believe that we will resolve everything gradually and will be building our life in harmony. You will live to see everything, I promise you, but we need to take it one day at a time, we cannot rush and we cannot make any more mistakes, I will see you and will tell me everything, starting with Rosen and everything else, and then I'll be doing everything as much as I can, but with a result, so you think your thoughts and prepare to meet me, and meanwhile try to keep the maximum strength and health.

Everyone of my friends is writing me, but I am already tired to keep answering this question, when? It's a wonderful thing and feeling, freedom, but I have so much to do and live through that I do not feel it. Probably I do not look at life as people around me, feeling that I did not have it at all, but honestly, everyone was writing the same thing, that we are with you, and will help as possible and pull out your favorite mother, and for what she did for you, they bow to her, it was just in the recent letter from my Slavchic and everyone else. So my dear mother, we never had an easy life, so we will go through this.

I Love you my Dear.

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6th Day of May, 2016



Notary Public

Timereman Stanislav
Notary Public, State of New York
No. 01TI6266831
Qualified in Kings County
My Commission Expires August 6, 2016

Exhibit 2B

FROM: SHELICHOV, MAKSIM
TO: 81448053
SUBJECT: RE: MY BUNNY!!!
DATE: 11/25/2013 07:51:04 AM

Hello My Life

My dearest mother, not only did you manage to help, but I repeat once again, that you saved my life, you just underestimate or overestimate, what could have happened otherwise. Believe me that at trial I was only thinking about you and praying to God understanding, that I only need maybe the last possibility to be free and fight with life, like it was meant for me, but, most importantly, I prayed to God to give me a chance to be a good son and help my mother, without that I cannot be human. And you know, maybe now it is very hard, but this is not the end of life, and where is a possibility, one needs to use it and manipulate life in a way that it will respond to him. But we are all good philosophers, like you say, talking is not like shuffling boxes, so now I am getting my chances..

I will never abandon you, never leave you, and believe me, I am very proud to say that my mother is the best and practically gave her life for me, and no gossip can say the same about himself.

That is why my darling, irreplaceable mother, everything will be all right for us, we only need patience and inextinguishable hope, faith and love.

Hugging you.

I, Boris Timerman, of 63 Brighton 2nd Place, Apt.3-B, Brooklyn, NY 11235, hereby certify that I am competent in both the English and Russian languages and the attached is a true and faithful translation of the original text.



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Notary Public

Timerman Stanislav
Notary Public, State of New York
No. 01TI6266831
Qualified in Kings County
My Commission Expires August 6, 2016

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop N2-20-16
Baltimore, Maryland 21244-1850



Office of Strategic Operations and Regulatory Affairs/Freedom of Information Group
Refer to: Control Number 071620147006 and PIN KMN4

6/15/2015

Irina Shelikhova
#81448053
Federal Correctional Institution
501 Capital Circle, NE
Tallahassee, FL 32301

Dear Ms. Shelikhova:

This letter is in response to your Freedom of Information Act (5 U.S.C. §552) request of 07/10/2014, which you sent to the Centers for Medicare & Medicaid. A CD containing the requested information was mailed to you under separate cover.

The following are the passwords for the files in the CD mailed to you:

- (a) = cmsfoia1
- (b) = cmsfoia2
- (c) = cmsfoia3

I trust this information will be of assistance to you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Olin".

Jay Olin
Director, Division of FOIA Analysis - C
Freedom of Information Group

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop N2-20-16
Baltimore, Maryland 21244-1850



Office of Strategic Operations and Regulatory Affairs/Freedom of Information Group

Refer to: Control Number 071620147006 and PIN KMN4

6/15/2015

Irina Shelikhova
#81448053
Federal Correctional Institution
501 Capital Circle, NE
Tallahassee, FL 32301

Dear Ms. Shelikhova:

This letter is in response to your Freedom of Information Act (5 U.S.C. §552) request of 7/10/2014, which you sent to the Centers for Medicare & Medicaid Services. Within your correspondence, you requested the billing information for the following clinics:

1. "Bay Medical Care, PC
Tax ID#: 20-2493460
7612 Bay Pkwy., Suite B
Brooklyn, NY 11214
2. SVS Wellcare Medical, PLLC
Tax ID#: 20-4829755
7616 Bay Pkwy., 1st Floor
Brooklyn, MN 11214

and

8686 Bay Pkwy., Unit 2M
Brooklyn, NY 11214

3. Szs Medical Care, PLLC
Tax ID#: 26-2027628
8686 Bay Pkwy., United 2M
Brooklyn, NY 11214"

Irina Shelikhova
071620147006

Page 2

You specifically asked the following under each tax identification number: From February 1, 2006, to July 16, 2010: the total dollar amount of payments made to each company minus any debits made for overpayments; the total dollar amount of claims submitted for payment; and the total dollar amount of claims rejected due to errors within the batches of the submitted claims.

Our agency initiated a search for records falling within the scope of your request, and located documents responsive to your request. After careful review of these documents, we have determined to release them to you in part pursuant to Exemption 6 of the FOIA (5 U.S.C. §552(b)(6)).

Exemption 6 of the FOIA permits a Federal agency to withhold information contained in personnel and medical files and similar files the disclosure of which would "constitute a clearly unwarranted invasion of personal privacy." I have weighed the public interest in disclosure (which the Supreme Court has held to be limited in this context to the public interest that would be served by shedding light in the agency's performance of its statutory duties) against the harm to the privacy of the individuals identified in these records and have concluded that the privacy interest of the subject individuals outweighs the public interest in disclosure in this particular matter.

If you disagree with the decision to withhold the documents determined to be exempt from disclosure, you may appeal. To do so you must put your appeal in writing and send it within 30 days of the date of this letter to: The Principal Deputy Administrator, CMS, Room C5-16-03, 7500 Security Boulevard, Baltimore, Maryland 21244-1850. Please mark your envelope containing your letter of appeal "Freedom of Information Act Appeal" and enclose a copy of this letter with your appeal.

Sincerely,

Hugh P. Gilmore -
S

Digitally signed by Hugh P. Gilmore -S
DN: c=US, o=U.S. Government, ou=HHS, ou=CMS,
ou=People, 09.2342.19200300.100.1.1=2001527759,
cn=Hugh P. Gilmore -S
Date: 2015.06.19 11:13:48 -04'00'

Jay Olin
Director, Division of FOIA Analysis - C
Freedom of Information Group

Enclosure: Responsive Documents on CD

From: mrosenlaw <mrosenlaw@aol.com>
To: mrosenlaw <mrosenlaw@aol.com>
Subject: Transmittal of discovery disks to Irina
Date: Fri, Nov 29, 2013 9:16 am

November 29, 2013

Irina--I am sending you with this note the following:

1- Disk, labeled, "Government Document Production-Medicare Applications and EFTs-10-CR-771 (NG)"

2- Disk, labeled, "Government Discovery-DVD (Bank Statements) and Exhibit A (List of Medicare Beneficiaries)"

I received these disks from Mr. Shapiro in response to my request to provide you with bank and other records.

I have sent you 3 prior document packages, including forms that you must fill out.
IT IS URGENT THAT YOU CONTACT ME DIRECTLY.

Michael Rosen (516-381-6690, cell)

Exhibit 4

From: mrosenlaw <mrosenlaw@aol.com>
To: mrosenlaw <mrosenlaw@aol.com>
Subject: Irina Shelikhova
Date: Thu, Feb 19, 2015 5:32 pm

MEMORANDUM

Dated: February 20, 2015

To: Irina Shelikhova
81448-053
Federal Correctional Institution
501 Capital Circle N.E.
Tallahassee, Florida 32301

BY UNITED STATES POST OFFICE MAIL

From: Michael Rosen, Esq., (516-381-6690)

Re: Case Documents

Irina--Pursuant to your request, I transmit herewith case file documents which I have numbered 1-506.

I have made a copy of all of these documents which I will retain for my purposes (there are some duplicates).

I also transmit disks denominated as containing: Medicare applications and EFTs, Bay Medical Care, SVS,

SZS, Medicare Enrollment Applications, SGS Beneficiary Interviews, EFT Application, EMC Application, etc., Title

III Recordings. I note that I provided you with disk(s) at the MCC. I note further that I have been advised that your Court appointed lawyer, on appeal, provided you with documents.



Michael Rosen

Exhibit 4A

**LIST OF PROFESSIONAL SERVICE PROVIDERS AND THEIR
RESPECTIVE SPECIALIZED PRACTICE**

Provider:	Specialty:
G. Drivas, M.D.	Internal Medicine
J. Wahl, M.D.	Internal Medicine
S. Raykher, M.D.	Internal Medicine
N. Dayen, D.O.	Internal Medicine
L. Guseynov, M.D.	Internal Medicine
I. Boginsrey, M.D.	Internal Medicine
N. Arnoff, D.O.	Dermatologist
R. Collins, M.D.	Neurologist
G. Lauffer, M.D.	Neurologist
M. Artomonov, M.D.	PMR
M. Moy, M.D.	PMR
Dr Ostrovski, M.D.	Pulmonologist
R. Bhardwaj, M.D.	Pulmonologist
Dr Khasidy, M.D.	Urologist
M. Butterman, M.D.	Urologist
L. Sorkin, M.D.	Gynecologist
D. Voldberg, M.D.	Podiatrist
R. Carrera, M.D.	Cardiologist
W. Fonfeder, M.D.	Gastroenterologist, Surgeon
N. Kumar, M.D.	Allergist, Dermatologist
Y.I. Ming Yang, M.D.	Allergist, Dermatologist
Dr Puma, M.D.	Allergist
Dr Constant	Radiologist
Dr Bernard	Radiologist
E. Matskina	Accupuncturist
N. Rogozina	Accupuncturist

PHARMACEUTICAL PURCHASES

Purchases made by SZS from PSS NORTHEAST for allergy treatments. Information collected from minimal available bank records obtained by movant. The government has all records. This listing is not inclusive of information and accounting.

PSS Northe - debit entry memo - 31192320 -

Chase Account - Number 750212888

02-02-09	2,610.00 (check no. 1182)
02-27-09	21,483.50 (debit)
04-03-09	33,373.83 (debit)
05-05-09	33,351.49 (debit)
06-10-09	23,543.13 (debit)
07-03-09	37,215.75 (debit)
08-06-09	12,476.76 (debit)
09-03-09	17,151.24 (debit)
10-05-09	19,929.67 (debit)
10-26-09	20,157.70 (debit)
11-08-09	4,431.50 (check no. 1261)

TD Bank

02-12-10	16,969.09 (debit)
02-18-10	19,079.96 (debit)
03-11-10	38,223.84 (debit)
03-26-10	30,233.05 (debit)
04-19-10	30,233.05 (debit)
05-05-10	15,000.00 (debit)

Bank of America - Acct. No. 483027813428

06-16-10 24,296.84 (debit)

Data received from Medicare dated June 15, 2015.

Regarding claims filed by Szs - Information transmitted via disk -
Control No. 071620147006

Total claims submitted: 65,535

Claims submitted by provider:

Dr. Wahl	22,600
Dr. Raykher	24,521
Dr. Voldberg	2,022
Dr. Artomonov	11,453
Dr. Guy	194
Dr. Bhardway	587
Dr. Laufer	152
Dr. Sorkin	192
Dr. Butterman	225
Dr. Moy	3,424
Dr. Carrera	143
Dr. Puma	22

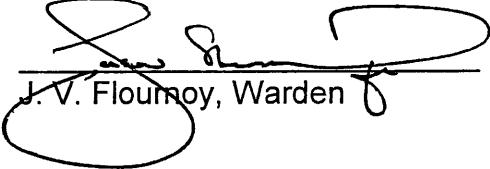
Administrative Remedy No. 788387-F1

Part B - Response

This is in response to your Request for Administrative Remedy No. 788387-F1, received July 30, 2014, wherein you request visitation privileges with your son be approved.

A review of records and consultation with staff revealed you were given a CIM assignment at the request of the United States Attorney in the Eastern District of New York. Specific details of the CIM assignment are not to be released to you. However, I have reviewed supporting documentation of this CIM assignment and found it to be appropriate.

Accordingly, your Request for Administrative Remedy is denied, in that your CIM assignment is appropriate and warranted. If you are dissatisfied with this response, you may appeal to the Regional Director, Southeast Regional Office, 3800 Camp Creek Parkway, S.W., Building 2000, Atlanta, Georgia 30331. Your appeal must be received in the Regional Office within 20 calendar days of the date of this response.


J.V. Flounoy, Warden


Date

administrative request. (Def. Exh. 1, 4:16)

20. On November 11, 2014, Defendant contacted an Assistant U.S.

Attorney (AUSA) who had prosecuted the Plaintiff, and learned that the AUSA

did not object to the Plaintiff's request, but recommended that Defendant speak

with Mr. Shelikhov's supervision officer who again advised that Mr. Shelikhov

had not secured employment or a stable residence; therefore, the supervision

officer would not authorize Mr. Shelikhov to visit Plaintiff. (Def. Exh. 1, 4:17)

21. Although the supervision officer has recently advised³ that Mr.

Shelikhov is currently in compliance with the terms of his supervision, the

Department of Justice (DOJ) Attorney also handling the Plaintiff's prosecution⁴

maintains that security concerns still exist. (Id., 4:18)

22. On March 31, 2016, the Unit Team consisting of the counselor, case manager, and Unit Manager, processed a visitation request from the Plaintiff for Mr. Shelikhov and submitted it to the Warden. (Id., 4:19) On April 8, 2016, the Warden upheld the Unit Team's denial of Plaintiff's visitation request due to security concerns. (Id.)

23. Plaintiff is however, permitted to communicate with Mr. Shelikhov via telephone, mail, electronic communication, and video conferencing. (Def. Exh.

³ The supervision officer has provided a letter dated April 1, 2016, authorizing Mr. Shelikhov to travel from New York to Florida to visit the Plaintiff over the next 120 days.

⁴ The case was prosecuted jointly by the U.S. Attorney's Office, Eastern District of New Jersey, and the DOJ, Criminal Division, Fraud Section.

MICHAEL ROSEN
Law Offices
61 Broadway, Suite 2602
New York, New York 10006
mrosenlaw@aol.com

CELL (516) 381-6690
TEL (212) 867-4100

FAX (516) 944-5066

November 29, 2012

Hon. Nina Gershon
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Irina Shelikhova, et al.
10-CR-771 (NG)

Dear Judge Gershon:

I represent Irina Shelikhova and submit this letter in response to the government's 404 (b) motion filed October 29, 2012 [Doc. 368].

The government's proffered evidence that before working at Bay Medical, Dr. Drivas "worked at a medical clinic in Brooklyn with... Irina Shelikhova" is not probative of the instant charges against my client, invites speculation, is unfairly prejudicial and should be excluded pursuant to Rule 403.

With respect to the uncharged allegations of Medicaid fraud relating to "REM Transportation" it appears to be bottomed on the potential testimony only of "a cooperating witness" which will trigger an extensive trial within a trial, is thus unfairly prejudicial and is really intended to put propensity improperly before the jury. It should be excluded.

With respect to the "flight" proffer, I respectfully submit that should Your Honor permit any part thereof, same should only be admissible if the jury is to be told that Mrs. Shelikhova voluntarily returned from a venue that could not extradite her and pursuant to an arrangement between her attorney and the government attorney.

Thank you.

Respectfully submitted,

Michael Rosen
Cell: (516) 381-6690

MR:wp